

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-JFJ
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

PLAINTIFF’S NOTICE OF PROPOSED REDACTIONS TO DOCKET NO. 399

Plaintiff Video Gaming Technologies, Inc. (“VGT”) hereby submits proposed redactions to the transcript of the September 3, 2019 pretrial hearing (the “Transcript”).

VGT requests redaction of confidential VGT information appearing on several pages of the Transcript, as shown in yellow highlighting in Exhibit A hereto. The redactions include information about VGT’s trade secrets and confidential business information at issue in this case (pages 23, 25–30, 32–40, 43) and VGT’s confidential business activities (pages 5, 25). The redactions thus “contain ‘sources of business information that might harm [VGT’s] competitive standing.’” *Deherrera v. Decker Truck Line, Inc.*, 820 F.3d 1147, 1162 n.8 (10th Cir. 2016) (quoting *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978)). Further, VGT has sought to limit the amount of redactions to a small amount of sensitive information, which has little, if any, bearing on the substance of the Transcript.

For these reasons, VGT respectfully requests that the Court maintain the Transcript under seal and apply VGT's proposed redactions, as shown in Exhibit A hereto, to the public version of the Transcript.

September 27, 2019

Respectfully submitted,

/s/ Gary Rubman

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Counsel for Video Gaming Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2019, I filed the foregoing Plaintiff's Notice of Proposed Redactions to Docket No. 399 via ECF, which caused a true and correct copy of the foregoing to be delivered to the following counsel:

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Exhibit A

Filed Under Seal